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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
HARRISONBURG DIVISION**

IN RE:

SEPOPO S. SENOUWOE

Debtor

CHAPTER 13

CASE NO. 24-50148

**TRUSTEE'S OBJECTION TO CONFIRMATION, MOTION TO DISMISS,  
AND REQUEST FOR DOCUMENTS AND AMENDMENTS**

COMES NOW the Chapter 13 Trustee, and (i) submits this request for documents and amendments from the Debtor(s) following the meeting of creditors, and (ii) objects to confirmation of the Plan filed on 4/12/24 and (iii) moves to dismiss this case unless all of the objections and requests for documents and amendments have been resolved prior to the hearing. The hearing on the Trustee's objection to confirmation and motion to dismiss or convert shall be held on:

**May 15, 2024 at 9:30 a.m.**

Parties should contact Judge Connelly's courtroom deputies at  
VAWBml\_Connelly\_Scheduling@vawb.uscourts.gov  
to obtain video access instructions and Zoom access information

1. The Trustee requests the Debtor to provide the following documents, or file with the Court the following amendments and pleadings, at least ten (10) days before the hearing noticed herein, to assist in resolving the Trustee's objections:

**Documents - Assets**

- Proof that an automatic payment process for future mortgage payments has been put into place. Arrears are: \$22,452.57.

**Documents - Income**

- Bank and financial statements from all personal and business accounts for the period of: March 2024

**Documents - Other**

- File a pre-confirmation affidavit from Debtor(s), or other appropriate evidence to satisfy matters addressed in the affidavit.

**Pleadings**

- Amend Schedule A/B, Part 2 - 8 (other property): to disclose balances in accounts on date of filing.
- Amend Schedule G: and update the matrix to disclose Snap Finance and notice creditor.
- Amend the Statement of Financial Affairs: Line 5 to disclose the retirement withdrawal of \$15,976.90 between November 2023 and March 2024 and \$16,810 withdrawal in 2022.

2. The Trustee objects to confirmation of the plan and requests that the Plan be amended to address the following issues:

**Amend Plan or Suggest Confirmation Order Language**

- Amend the plan to provide for the full secured debt arrearage claim, or object to the claim #2-1, filed by Citizens Bank, NA for \$22,452.57 (higher than estimated).
- Amend the plan to assume or reject the executory contract with: Snap Finance.

**Objections**

- The Plan does not meet the Chapter 7 liquidation test pursuant to 11 U.S.C. Section 1325(a) (4). Trustee to review amended Schedule A/B for bank balances.

3. The Trustee prays that any confirmation order entered in this case shall include the following other provisions:

**Conf - Fix Plan Terms**

- Part 3.1 of the Plan is amended to authorize the Trustee to disburse pre-petition arrears pro-rata.
4. The Trustee shall ask for dismissal or conversion of the case if the Debtor does not timely commence making Plan payments at the rate and in the amounts stated in their Plan. If the Plan calls for payments through an automatic wage deduction from an employer, the Debtor must make payments directly to the Trustee until the wage deduction takes effect.

**WHEREFORE**, your Trustee requests that the Court dismiss or convert this case if the Debtor(s) fail to do any of the following: (i) resolve the objections noticed herein, (ii) provide the requested modifications, documents, amendments, and/or actions; (iii) appear at the original or adjourned Meeting of Creditors; (iv) remain current in Plan payments; or (v) file a confirmable Plan.

Dated: April 22, 2024

/s/ Shannon Morgan

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Shannon Morgan  
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**CERTIFICATE OF SERVICE**

I certify that a true copy of this Trustee's Request for Documents and Amendments, Objection to Confirmation, and Motion to Dismiss or Convert was served by first class mail, postage paid, upon the Debtor and served electronically upon the Debtor's counsel on April 22, 2024.

/s/ Shannon Morgan

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